

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE CITIGROUP INC. BOND  
LITIGATION

Master File No. 08 Civ. 9522 (SHS)

**NOTICE OF BOND PLAINTIFFS' MOTION FOR  
APPROVAL OF DISTRIBUTION PLAN AND BOND COUNSEL'S  
REQUEST FOR APPROVAL OF PAYMENT OF LITIGATION EXPENSE**

**PLEASE TAKE NOTICE** that, upon the accompanying Declaration of Stephen J. Cirami in Support of Bond Plaintiffs' Motion for Approval of Distribution Plan (the "Cirami Declaration")<sup>1</sup> submitted by the Court-approved Claims Administrator, The Garden City Group, Inc. ("GCG"), the Declaration of Rochelle Feder Hansen in Support of Request for Approval of Payment of Litigation Expense, and the Memorandum in Support of Bond Plaintiffs' Motion for Approval of Distribution Plan and Bond Counsel's Request for Approval of Payment of Litigation Expense, and pursuant to Federal Rule of Civil Procedure 23(e), Bond Plaintiffs Louisiana Sheriffs' Pension and Relief Fund, Arkansas Teacher Retirement System, City of Tallahassee Retirement System, City of Philadelphia Board of Pensions and Retirement, Miami Beach Employees' Retirement Plan, Southeastern Pennsylvania Transportation Authority, American European Insurance Company, Phillip G. Ruffin and James M. Brown will move this Court, before the Honorable Sidney H. Stein, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for entry of the accompanying [Proposed] Order Approving Distribution Plan and Payment of Litigation Expense, which will, *inter alia*: (i) approve GCG's administrative recommendations accepting and rejecting Proofs of Claim submitted herein; (ii) direct

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<sup>1</sup> All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Cirami Declaration.

an Initial Distribution of the Net Settlement Fund to Claimants whose Proofs of Claim have been accepted as valid and approved by the Court, while maintaining a Reserve for any contingencies that may arise, including the payment of any Claims-in-Process and disputed Claims that ultimately may be determined to be eligible; (iii) provide for a distribution to any of the Claims-in-Process and disputed Claims determined to be eligible, following a motion to the Court for approval of such Claims; (iv) direct that Initial Distribution and Claims-in-Process Distribution checks state that the check must be cashed within 120 days after the issue date; (v) provide for a Second Distribution (and, if necessary, subsequent distributions) of any funds remaining after the Initial Distribution and the Claims-in-Process Distribution (including the Reserve and the funds for all void stale-dated checks); (vi) direct that Authorized Claimants will forfeit all recovery from the Settlement if they fail to cash their distribution checks in a timely manner; (vii) release claims related to the claims administration process; (viii) approve GCG's fees and expenses incurred and estimated to be incurred in connection with the administration of the Settlement; (ix) approve payment from the Settlement Fund of an incurred Litigation Expense that was not included in Bond Counsel's original application for an award of attorneys' fees and Litigation Expenses; (x) authorize the destruction of Proofs of Claim and supporting documents after the Second Distribution; and (xi) provide that the Court retains jurisdiction to consider any further applications concerning the administration of the Settlement, and such other and further relief as the Court deems appropriate.

The [Proposed] Order Approving Distribution Plan and Payment of Litigation Expense is attached hereto as Exhibit 1.

Dated: July 18, 2014

Respectfully submitted,

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